

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF PENNSYLVANIA**

LISA BARBOUNIS

Plaintiff,

-vs-

THE MIDDLE EAST FORUM,  
DANIEL PIPES (*individually*), and  
GREG ROMAN (*individually*),  
Defendants.

:  
:  
:  
:  
:  
:  
:  
:  
:  
:

CIVIL ACTION

NO. 2:19-cv-05030-JDW

**MOTION FOR EXTENTION TO FILE ANSWER TO  
DEFENDANTS' PETITION FOR ATTORNEY'S FEES**

Plaintiff, Lisa Barbounis hereby requests a short extension to Sunday, December 13, 2020 to file her Response to Defendants' Petition for Attorney's Fees. Plaintiff's counsel had a deposition that ran until 8:00 P.M., on December 11, 2020 and requests a short extension to file her Response by Sunday at midnight.

1. Plaintiff, Lisa Barbounis Response to Defendants' Petition for Attorney's Fees is currently due December 11, 2020.

2. Plaintiff, Sheila Jackson requests a short extension of two (2) days to prepare an adequate response to Defendants' Petition.

3. As this matter involves close to ten thousand dollars, Plaintiff requests this time to prepare a thoughtful response.

4. Therefore, requests an extension of time to Sunday, December 13, 2020 to file her response to Defendants' Petition.

5. In compliance with Local Rules, undersigned counsel certifies that he made a reasonable effort to confer with Defendants' counsel regarding the contents of this Motion via electronic communication. Defendants stated that their client would not agree to this request.

6. This request will not affect any other deadline in this case.

BY: /s/ Seth D. Carson  
Seth D. Carson, Esquire  
Derek Smith Law Group, PLLC  
1835 Market Street, Suite 2950  
Philadelphia, PA 19103  
Phone: 215.391.4790  
Email: Seth@ DerekSmithLaw.com  
Counsel for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on this date that I caused a true and correct copy of Plaintiff's Motion Defendants to be served via ECF.

David J. Walton (PA # 86019)  
Leigh Ann Benson (PA #319406)  
Cozen O'Connor  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103  
P: 215-665-2000  
F: 215-665-2013  
dwalton@cozen.com  
lbenson@cozen.com

Sidney L. Gold sgold@discrimlaw.  
Sidney L. Gold & Associates P.C.  
1835 Market Street, Suite 515  
Philadelphia, PA 19103  
Tel: (215) 569-1999  
Fax: (215) 569-3870  
Counsel for The Middle East Forum

**DEREK SMITH LAW GROUP, PLLC**

BY: /s/ Seth D. Carson  
SETH D. CARSON  
Derek Smith Law Group, PLLC  
1835 Market Street  
Suite 2950  
Philadelphia, PA 19103  
Phone: 215.391.4790  
Facsimile: 215.893.5288  
Email: [Seth@DerekSmithLaw.com](mailto:Seth@DerekSmithLaw.com)

DATED: December 11, 2020